

Marc Joseph Stout
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October 16, 2023

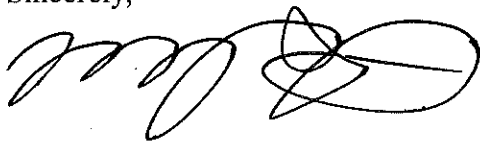
Clerk (Civil)
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Reyes v. The City of New York, No. 1:23-cv-06369

Dear Clerk,

Please find enclosed and file with the court Marc Stout's "Motion for Leave to File Amicus Curiae Brief."

Sincerely,

A handwritten signature in black ink, appearing to be "MJS" with a large, stylized flourish at the end.

Marc J. Stout

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SEANPAUL REYES,)	
)	
Plaintiff,)	
)	
v.)	Case No. 23-cv-6369
)	
THE CITY OF NEW YORK,)	
)	
Defendant.)	
_____)	

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF

Marc Joseph Stout hereby requests that this court grant Stout leave to file the attached amicus curiae brief and states as follows in support:

I. Movant's Interest

Reyes filed a motion for a preliminary injunction, Dkt. 7, requesting that the court enjoin The City of New York from enforcing an NYPD policy prohibiting filming in NYPD Precincts.

Stout's interest in the case is that Stout has a Youtube channel, Frauditors Exposed, featuring livestreams and videos of Stout professing that government building properties, including police station properties, are non public forums, and that individuals, including "sovereign citizens/First Amendment auditors" and January 6th Capitol insurrectionists, do not have a right to film in non public forums. Stout professes that individuals who enter onto government building property, including police station property, to film in purposeful violation of building policy prohibiting or restricting filming are common criminals violating clearly established property rights.

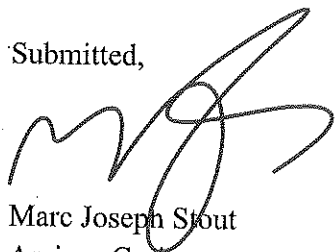
II. Why Brief is Desirable and Matters are Relevant

Reyes filed a motion for a preliminary injunction, Dkt. 7, requesting that the court enjoin The City of New York from enforcing an NYPD policy prohibiting filming in NYPD Precincts.

Stout's brief is desirable because Stout was the Plaintiff to a federal lawsuit, *Stout v. Mischou*, challenging Manassas City Police Department's policy restricting filming on the police station's property. *Stout v. Mischou* is the only case on point and governs the outcome of Reyes' motion.

Stout's brief is relevant because whether or not NYPD's policy is reasonable, and whether or not individuals have the right to record in NYPD police precinct lobbies, hinges on whether or not NYPD's police precinct lobbies are non public forums. Stout's amicus curiae brief argues that NYPD's police precinct lobbies are non public forums.

Submitted,



Marc Joseph Stout
Amicus Curiae
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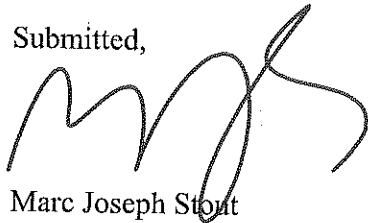
Date 10/16/2023

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2023, I emailed a copy of this document to the Plaintiff's attorney at:

Andrew Case
LatinoJustice PRLDEF
475 Riverside Drive
Suite 1901
New York New York
(212) 739-7506
acase@latinojustice.org

Submitted,



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Date

10/16/2023

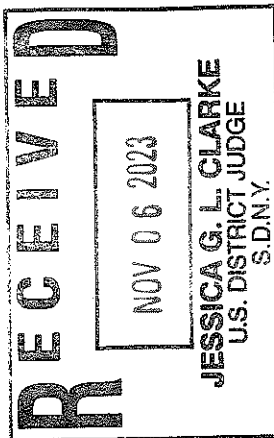
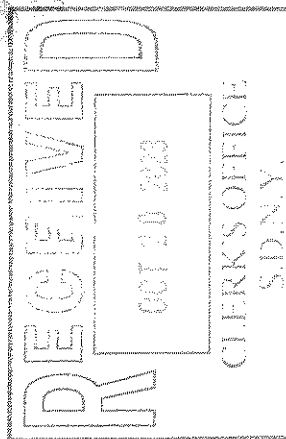
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bc



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